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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NATALIE RUISI,
 Plaintiff,
 vs.
 ARAMARK SPORTS AND
 ENTERTAINMENT SERVICES, LLC, a
 Foreign Limited Liability Company;
 ARAMARK CAMPUS, LLC, a Foreign
 Limited Liability Company; ARAMARK
 EDUCATIONAL GROUP, LLC, a Foreign
 Limited Liability Company; ARAMARK
 EDUCATIONAL SERVICES, LLC, a
 Foreign Limited Liability Company;
 ARAMARK SPORTS AND
 ENTERTAINMENT GROUP, LLC, a
 Foreign Limited Liability Company;
 ARAMARK SERVICES, INC., a Foreign
 Corporation; and, ROE Business
 Organizations I-X; and DOE INDIVIDUALS
 I-X, Inclusive,
 Defendants.

Case No. 2:20-CV-01544-JCM-VCF

**JOINT NOTICE OF SETTLEMENT
 AND JOINT STIPULATION TO STAY
 ALL PENDING DISCOVERY
 DEADLINES AND HEARINGS;
 [PROPOSED] ORDER**

Magistrate Judge: Hon. Cam Ferenbach

Trial Date: None Set

TO THE COURT, THE PARTIES AND THEIR ATTORNEYS OF RECORD:

This Joint Notice of Settlement and Joint Stipulation is made by and between Plaintiff Natalie Ruisi (“Plaintiff”), and Defendants, Aramark Campus, LLC, *et al.* (“Defendants”), by and through their respective counsel of record, based upon the following facts establishing good cause:

RECITALS

1. WHEREAS, on May 10, 2021, this Court issued an Order setting several discovery deadlines [ECF No. 79] (“Discovery Order”);

2. WHEREAS, on May 19, 2021, Plaintiff filed her Motion to Compel Responses To Plaintiff’s First, Second and Third Sets of Interrogatories and First And Second Sets of Requests for Production of Documents [ECF No. 82]; and her Motion for Leave To File Confidential Documents Under Seal [ECF No. 83] (collectively “Motions”);

3. WHEREAS, on July 20, 2021, the Parties filed a Joint Stipulation informing the Court that in light of the Parties’ good faith attempt to resolve this matter at mediation, the Parties agreed to continue the hearing on Plaintiff’s Motions, and that should the Parties not resolve this matter at mediation, the Parties will submit a new discovery schedule for the Court’s approval.

4. WHEREAS, on July 20, 2021, the Court vacated the hearing on Plaintiff’s Motions and set a new hearing date for August 26, 2021 [ECF No. 89];

5. WHEREAS, on August 9, 2021, the Parties attended mediation in good faith;

6. WHEREAS, on August 12, 2021, the Parties reached an agreement of the material terms of settlement and are currently negotiating the specific terms of the Parties’ settlement agreement;

7. WHEREAS, the Parties anticipate filing a Joint Stipulation of Dismissal with Prejudice for the Court’s approval within 60 days;

8. WHEREAS, in light of this settlement in principal, counsel for the Parties have met and conferred and agree that the Court’s discovery deadlines set forth in the Discovery Order, as well as the hearing on Plaintiff’s Motions should be stayed until the Court rules on the forthcoming Joint Stipulation for Dismissal with Prejudice.

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STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned Parties through their respective counsel of record that:

1. The Parties shall file a Joint Stipulation of Dismissal with Prejudice for the Court's approval within 60 days;

2. The Parties request that the Court schedule a status conference in 60 days, to be vacated upon the Parties filing a Joint Stipulation of Dismissal with Prejudice; and

3. The discovery deadlines set forth in the Court's Discovery Order, as well as the August 26, 2021 hearing on Plaintiff's Motions be stayed until the Court rules on the Parties' forthcoming Joint Stipulation of Dismissal with Prejudice.

IT IS SO STIPULATED.

Dated: August 19, 2021

KEMP & KEMP

By: /s/ Victoria L. Neal
James P. Kemp
Victoria L. Neal
Attorneys for Plaintiff Natalie Ruisi

Dated: August 19, 2021

MORGAN, LEWIS & BOCKIUS LLP

By /s/ George S. Benjamin
Jason S. Mills
George S. Benjamin
Attorneys for Defendants

ATTESTATION

I, George Benjamin, am the ECF user whose identification and password are being used to file this Joint Notice of Settlement and Joint Stipulation to Stay All Pending Discovery Deadlines and Hearings; [Proposed] Order. In compliance with LR IC 5-1(d), I hereby attest that Victoria L. Neal concurs in this filing.

Dated: August 19, 2021

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ George S. Benjamin

George S. Benjamin
Attorneys for Defendants

ORDER

Based on the stipulation of the Parties, and good cause shown, **IT IS HEREBY ORDERED**
THAT:

October 20, 2021

The Parties shall file a Joint Stipulation of Dismissal with Prejudice within 60 days. The Court will schedule a video status conference for October 25, 2021 at 10:00 AM, to be vacated upon the Parties filing a Joint Stipulation of Dismissal with Prejudice; and

The discovery deadlines set forth in the Court's May 10, 2021 Court Order [ECF No. 79], as well as the August 26, 2021 hearing on Plaintiff's Motion to Compel Responses To Plaintiff's First, Second and Third Sets of Interrogatories and First And Second Sets of Requests for Production of Documents [ECF No. 82], and Motion for Leave To File Confidential Documents Under Seal [ECF No. 83], are stayed pending the Court's ruling on the Parties' forthcoming Joint Stipulation of Dismissal with Prejudice. The hearing scheduled for August 26, 2021, is VACATED.

IT IS SO ORDERED.

August 20, 2021
Dated: _____



UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below, a copy of the **JOINT NOTICE OF SETTLEMENT AND JOINT STIPULATION TO STAY ALL PENDING DISCOVERY DEADLINES AND HEARINGS; [PROPOSED] ORDER** was served on the following as indicated:

All Parties Registered Through the CM/ECF system.

Dated this 19th day of August 2021.

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ George S. Benjamin

Jason S. Mills

George S. Benjamin

Attorneys for Defendants